

Eric L. Cramer (*pro hac vice*)  
BERGER & MONTAGUE, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4604  
ecramer@bm.net

Joseph R. Saveri (*pro hac vice*)  
JOSEPH SAVERI LAW FIRM, INC.  
601 California Street, Suite 1000  
San Francisco, CA 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com

Richard A. Koffman (*pro hac vice*)  
COHEN MILSTEIN SELLERS & TOLL, PLLC  
1100 New York Ave., N.W., Suite 500, East Tower  
Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408 4699  
rkoffman@cohenmilstein.com

*Co-Lead Counsel for the Classes and  
Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Brandon Vera, and Kyle Kingsbury*

[Additional counsel appear on signature page]

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

**Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,**

**Plaintiffs,**

**vs.**

**Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,**

**Defendant.**

**Case No.: 2:15-cv-01045 RFB-(PAL)**

**PLAINTIFFS' MOTION FOR LEAVE TO  
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-  
2 5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”)  
3 issued in this action on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry,  
4 Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all  
5 others similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge  
6 certain documents under seal related to their Motion for Class Certification.

7 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly  
8 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and  
9 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court,  
10 the Party claiming protection shall file a motion to seal setting forth the bases for sealing and  
11 proper authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or  
12 some other applicable authority.” ECF No. 217 at 15.

13 The documents referenced below (or portions thereof) have been designated or refer to  
14 materials which have been designated Confidential or Highly Confidential – Attorneys’ Eyes Only  
15 by Defendant or third parties. Accordingly, Plaintiffs seek leave to lodge the following documents  
16 under seal.

17 First, Plaintiffs seek leave to lodge under seal Plaintiffs’ Motion for Class Certification.

18 Second, Plaintiffs seek leave to lodge under seal Exhibit 1 to the Declaration of Eric L.  
19 Cramer in Support of Plaintiffs’ Motion for Class Certification (the “Cramer Declaration”), which  
20 is a document entitled Expert Report of Hal J. Singer, Ph.D., dated August 31, 2017.

21 Third, Plaintiffs seek leave to lodge under seal Exhibit 2 to the Cramer Declaration, which  
22 is a document entitled Rebuttal Expert Report of Hal J. Singer, Ph.D., dated January 12, 2018.

23 Fourth, Plaintiffs seek leave to lodge under seal Exhibit 3 to the Cramer Declaration, which  
24 is a document entitled Expert Report of Andrew Zimbalist in *Cung Le, et al. v. Zuffa, LLC*, dated  
25 August 30, 2017.

26 Fifth, Plaintiffs seek leave to lodge under seal Exhibit 4 to the Cramer Declaration, which is  
27 a document entitled Expert Rebuttal Report of Andrew Zimbalist, dated December 26, 2017.

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1 Sixth, Plaintiffs seek leave to lodge under seal Exhibit 6 to the Cramer Declaration, which is  
2 a document entitled Expert Report of Guy Davis, CPA, CIRA, CDBV, CFE, dated August 31, 2017.

3 Seventh, Plaintiffs seek leave to lodge under seal Exhibit 7 to the Cramer Declaration,  
4 which is a document entitled Rebuttal Expert Report of Guy Davis, CPA, CIRA, CDBV, CFE,  
5 dated January 12, 2018.

6 Eighth, Plaintiffs seek leave to lodge under seal Exhibit 8 to the Cramer Declaration, which  
7 is a document entitled UFC - Hal Singer Report - Errata, which was introduced as Exhibit 2 in the  
8 deposition of Hal J. Singer, Ph.D., which took place on September 27, 2017.

9 Ninth, Plaintiffs seek leave to lodge under seal Exhibit 9 to the Cramer Declaration, which  
10 is a document entitled UFC - Hal Singer Report – Errata II, which was introduced as Exhibit 3 in  
11 the deposition of Hal J. Singer, Ph.D., which took place on September 27, 2017.

12 Tenth, Plaintiffs seek leave to lodge under seal Exhibit 10 to the Cramer Declaration, which  
13 is a document entitled Errata to the Expert Report of Andrew Zimbalist in *Cung Le, et al. v. Zuffa,*  
14 *LLC*, which was introduced as Exhibit 2 in the deposition of Andrew Zimbalist, Ph.D., which took  
15 place on September 25, 2017.

16 Eleventh, Plaintiffs seek leave to lodge under seal Exhibit 11 to the Cramer Declaration,  
17 which contains excerpts from a document entitled Expert Report of Professor Robert H. Topel,  
18 dated October 27, 2017.

19 Twelfth, Plaintiffs seek leave to lodge under seal Exhibit 13 to the Cramer Declaration,  
20 which contains excerpts from the transcript of Plaintiffs' 30(b)(6) Deposition of Zuffa, LLC's  
21 designee Kirk D. Hendrick, dated November 29, 2016.

22 Thirteenth, Plaintiffs seek leave to lodge under seal Exhibit 16 to the Cramer Declaration,  
23 which contains excerpts from the transcript of Plaintiffs' Deposition of Lorenzo J. Fertitta, dated  
24 March 23, 2017.

25 Fourteenth, Plaintiffs seek leave to lodge under seal Exhibit 17 to the Cramer Declaration,  
26 which contains excerpts from the transcript of Plaintiffs' Deposition of Sean Shelby, dated April 12,  
27 2017.

1 Fifteenth, Plaintiffs seek leave to lodge under seal Exhibit 18 to the Cramer Declaration,  
2 which contains excerpts from the transcript of Plaintiffs' 30(b)(6) Deposition of Deutsche Bank  
3 Securities, Inc.'s corporate designee Drew Goldman, dated April 28, 2017.

4 Sixteenth, Plaintiffs seek leave to lodge under seal Exhibit 19 to the Cramer Declaration,  
5 which contains excerpts from the transcript of Plaintiffs' Deposition of Joseph Silva, dated June 7,  
6 2017.

7 Seventeenth, Plaintiffs seek leave to lodge under seal Exhibit 20 to the Cramer Declaration,  
8 which contains excerpts from the transcript of Plaintiffs' Deposition of Scott Coker, dated August  
9 3, 2017.

10 Eighteenth, Plaintiffs seek leave to lodge under seal Exhibit 21 to the Cramer Declaration,  
11 which contains excerpts from the transcript of Plaintiffs' Deposition of Dana F. White, Vol. II, dated  
12 August 9, 2017.

13 Nineteenth, Plaintiffs seek leave to lodge under seal Exhibit 23 to the Cramer Declaration,  
14 which contains excerpts from the transcript of Plaintiffs' Deposition of Robert Topel, dated  
15 December 5, 2017.

16 Twentieth, Plaintiffs seek leave to lodge under seal Exhibit 24 to the Cramer Declaration,  
17 which contains excerpts from the transcript of Plaintiffs' Deposition of Robert Topel, Vol. II, dated  
18 December 6, 2017.

19 Twenty-first, Plaintiffs seek leave to lodge under seal Exhibit 26 to the Cramer Declaration,  
20 which is a document produced by Defendant in this litigation with the Bates number ZFL-1240584.

21 Twenty-second, Plaintiffs seek leave to lodge under seal Exhibit 27 to the Cramer  
22 Declaration, which is a document produced by Defendant in this litigation with the Bates number  
23 ZFL-1376378.

24 Twenty-third, Plaintiffs seek leave to lodge under seal Exhibit 28 to the Cramer Declaration,  
25 which contains excerpts from a document produced by Defendant in this litigation with the Bates  
26 number ZFL-1384297.

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1 Twenty-fourth, Plaintiffs seek leave to lodge under seal Exhibit 29 to the Cramer  
2 Declaration, which is a document produced by Defendant in this litigation with the Bates number  
3 ZFL-1391183.

4 Twenty-fifth, Plaintiffs seek leave to lodge under seal Exhibit 30 to the Cramer Declaration,  
5 which is a document produced by Defendant in this litigation with the Bates number ZFL-1421551.

6 Twenty-sixth, Plaintiffs seek leave to lodge under seal Exhibit 31 to the Cramer  
7 Declaration, which is a document produced by Defendant in this litigation with the Bates number  
8 ZFL-2469208.

9 Twenty-seventh, Plaintiffs seek leave to lodge under seal Exhibit 32 to the Cramer  
10 Declaration, which is a document produced by Defendant in this litigation with the Bates number  
11 ZFL-12543287.

12 Twenty-eighth, Plaintiffs seek leave to lodge under seal Exhibit 33 to the Cramer  
13 Declaration, which is a document produced by Defendant in this litigation with the Bates number  
14 ZUF-00031544.

15 Twenty-ninth, Plaintiffs seek leave to lodge under seal Exhibit 34 to the Cramer  
16 Declaration, which is a document produced by Defendant in this litigation with the Bates number  
17 ZUF-00122280.

18 Thirtieth, Plaintiffs seek leave to lodge under seal Exhibit 35 to the Cramer Declaration,  
19 which contains excerpts from a document produced by Defendant in this litigation with the Bates  
20 number ZUF-00162329.

21 Thirty-first, Plaintiffs seek leave to lodge under seal Exhibit 36 to the Cramer Declaration,  
22 which is a document produced by Defendant in this litigation with the Bates number ZUF-  
23 00296703.

24 Thirty-second, Plaintiffs seek leave to lodge under seal Exhibit 37 to the Cramer  
25 Declaration, which is a document produced by Defendant in this litigation with the Bates number  
26 ZUF-00336384.

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1 Thirty-third, Plaintiffs seek leave to lodge under seal Exhibit 38 to the Cramer Declaration,  
2 which contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this  
3 litigation with the Bates number DB-ZUFFA-00006389.

4 Thirty-fourth, Plaintiffs seek leave to lodge under seal Exhibit 39 to the Cramer  
5 Declaration, which contains excerpts from a document produced by third party Deutsche Bank  
6 Securities, Inc. in this litigation with the Bates number DB-ZUFFA-00006712.

7 Thirty-fifth, Plaintiffs seek leave to lodge under seal Exhibit 40 to the Cramer Declaration,  
8 which contains excerpts from a document produced by third party The Raine Group, LLC in this  
9 litigation with the Bates number RAINE0020633.

10 Thirty-sixth, Plaintiffs seek leave to lodge under seal Exhibit 41 to the Cramer Declaration,  
11 which contains excerpts from a document produced by WME-IMG in this litigation with the Bates  
12 number WME\_ZUFFA\_00001150.

13 Thirty-seventh, Plaintiffs seek leave to lodge under seal Exhibit 42 to the Cramer  
14 Declaration, which contains excerpts from a document produced by Defendant in native excel  
15 format with the Bates number ZFL-2699678, which was introduced as Exhibit 3 in Plaintiffs'  
16 30(b)(6) Deposition of Zuffa, LLC's designee Jeff Quinn. To create the exhibit, Plaintiffs sorted the  
17 entries chronologically and added a column with row numbers.

18 Thirty-eighth, Plaintiffs seek leave to lodge under seal Exhibit 48 to the Cramer  
19 Declaration, which contains excerpts from the transcript of Plaintiffs' Deposition of Dana F. White,  
20 Vol. I, dated August 9, 2017.

21 Plaintiffs have filed all of these documents under seal, in accordance with the Court's ECF  
22 system, with the instant motion. Plaintiffs have publicly filed placeholders for or redacted versions  
23 of these documents with the Court, and will serve un-redacted versions of these documents on  
24 Defendant, in accordance with LR IC 4-1(c)(4).

1 Dated: February 16, 2018

Respectfully Submitted,

2 By: /s/ Eric L. Cramer  
Eric L. Cramer

3 Eric L. Cramer (*Pro Hac Vice*)  
4 Michael Dell'Angelo (*Pro Hac Vice*)  
Patrick F. Madden (*Pro Hac Vice*)  
5 Mark R. Suter (*Pro Hac Vice*)  
BERGER & MONTAGUE, P.C.  
6 1622 Locust Street  
Philadelphia, PA 19103  
7 Phone: (215) 875-3000/Fax: (215) 875-4604  
ecramer@bm.net  
8 mdellangelo@bm.net  
pmadden@bm.net  
9 msuter@bm.net

10 Joseph R. Saveri (*Pro Hac Vice*)  
Joshua P. Davis (*Pro Hac Vice*)  
11 Jiamin Chen (*Pro Hac Vice*)  
Kevin E. Rayhill (*Pro Hac Vice*)  
12 JOSEPH SAVERI LAW FIRM, INC.  
601 California Street, Suite 1000  
13 San Francisco, California 94108  
Phone: (415) 500-6800/Fax: (415) 395-9940  
14 jsaveri@saverilawfirm.com  
jdavis@saverilawfirm.com  
15 jchen@saverilawfirm.com  
krayhill@saverilawfirm.com

16 Benjamin D. Brown (*Pro Hac Vice*)  
17 Richard A. Koffman (*Pro Hac Vice*)  
Daniel H. Silverman (*Pro Hac Vice*)  
18 COHEN MILSTEIN SELLERS & TOLL, PLLC  
1100 New York Ave., N.W., Suite 500  
19 Washington, DC 20005  
Phone: (202) 408-4600/Fax: (202) 408 4699  
20 bbrown@cohenmilstein.com  
rkoffman@cohenmilstein.com  
21 dsilverman@cohenmilstein.com

22 **Co-Lead Class Counsel**

**Liaison Counsel for the Class**

Don Springmeyer (Nevada Bar No. 1021)  
Bradley S. Schrager (Nevada Bar No. 10217)  
WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
RABKIN, LLP  
3556 E. Russell Road, Second Floor  
Las Vegas, Nevada 89120  
Phone: (702) 341-5200/Fax (702) 341-5300  
dspringmeyer@wrslawyers.com  
bschrager@wrslawyers.com

**Additional Counsel for the Classes:**

Robert C. Maysey (*Pro Hac Vice*)  
Jerome K. Elwell (*Pro Hac Vice*)  
WARNER ANGLE HALLAM JACKSON &  
FORMANEK PLC  
2555 E. Camelback Road, Suite 800  
Phoenix, AZ 85016  
Phone: (602) 264-7101/Fax: (602) 234-0419  
rmaysey@warnerangle.com  
jelwell@warnerangle.com

Frederick S. Schwartz (*pro hac vice*)  
LAW OFFICE OF FREDERICK S. SCHWARTZ  
15303 Ventura Boulevard, #1040  
Sherman Oaks, CA 91403  
Phone: (818) 986-2407/Fax: (818) 995-4124  
fred@fredschwartzlaw.com

William G. Caldes (admitted *pro hac vice*)  
SPECTOR ROSEMAN KODROFF & WILLIS, P.C.  
1818 Market Street – Suite 2500  
Philadelphia, PA 19103  
Phone: (215) 496-0300/Fax: (215) 496-6611  
wcaldes@srkw-law.com

John D. Radice (admitted *pro hac vice*)  
RADICE LAW FIRM, P.C.  
34 Sunset Blvd.  
Long Beach, NJ 08008  
Phone: (646) 245-8502  
jradice@radicelawfirm.com



**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of February, 2018, a true and correct copy of  
**PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL** and **PROPOSED  
ORDER** was served via the United States District Court CM/ECF system on all parties or persons  
requiring notice.

By: /s/ Eric L. Cramer